Modern Slavery Act 2015

Slavery and Human trafficking statement ("Statement") as required under s54 of the Modern Slavery Act 2015 ("the Act") for the financial year ended 31 December 2020 ("Financial Year"). This statement applies to all companies within Intercontinental Exchange, Inc. ("ICE") that are required to have a modern slavery statement in accordance with the Act ("the Relevant Companies").

Introduction

Intercontinental Exchange (NYSE:ICE) is a Fortune 500 company formed in the year 2000 to digitize the energy markets and provide greater price transparency.. ICE is a leading provider of data, technology, and market infrastructure.

ICE provides financial technology and data services across major asset classes that offer our customers access to mission-critical workflow tools that increase transparency and operational efficiencies. We operate **exchanges**, including the **New York Stock Exchange**, and **clearing houses** that help people invest, raise capital and manage risk across multiple asset classes. ICE operates 13 exchanges and 6 clearing houses worldwide. As the parent company of the New York Stock Exchange, ICE is the premier venue for raising capital in the world, driving economic growth and transforming markets.

Our comprehensive fixed income **data services** and execution capabilities provide information, analytics and platforms that help our customers capitalize on opportunities and operate more efficiently. Regardless of asset class, ICE provides the data to help surface new insights that lead to innovation. We design, build and operate an integrated network of data solutions that connect all points of the transaction workflow. From cross-asset pricing and reference data, to analytics and thousands of indices that provide streaming insight, to emerging metrics such as ESG, we securely deliver the data you need. At ICE Mortgage Technology, we are transforming and digitizing the U.S. residential mortgage process, from consumer engagement through loan registration. Together, we transform, streamline and automate industries to connect our customers to opportunity.

Our policies and controls

ICE and the Relevant Companies are committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business.

The ICE Modern Slavery Policy reflects this commitment to acting ethically and with integrity in all ICE business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. ICE is committed to maintaining systems and processes that protect its employees and avoid any issue that can be perceived as a human rights violation. ICE implements policies related to non-discrimination, equal opportunity and non-harassment. This financial year has seen the continuation of compulsory anti-workplace harassment and anti-sexual harassment training for all employees across the ICE Group.

ICE believes that its approach to professionalism, respect and integrity has served ICE well, and continues to ensure that the rights of employees and applicants are protected around the world. ICE complies with all applicable laws and regulations on forced or child labor, and the rights of employees to organize a union. The ICE Global Code of Business Conduct, which is applicable to all Directors and all employees of the ICE group, is designed to ensure compliance with our core values that focus on professionalism and integrity.

Assessment of Modern Slavery Risk

It is ICE's view that it operates within an industry where the risk of modern slavery is low, based on the nature of the relevant products and services as well as the location of significant operations.

Notwithstanding this, ICE unequivocally supports the drive to eradicate modern slavery and fully supports the requirements of the Act. Relevant Companies are undertaking their fifth broad "Modern

Slavery Risk" review of their current vendor base, focusing on the vendors that make up the top 75% of spend and identified relevant third parties.

The Relevant Companies use the ICE Vendor Management Policy, in place since October 2015 to categorise vendors, based on a defined criteria, into High, Medium or Low risk categories. As part of the fifth annual Modern Slavery Risk review, these vendors and relevant third parties are evaluated for Modern Slavery risk using the guidance published by the Walk Free Foundation (and other sources)[1] on tackling modern slavery in supply chains. This review will categorize relevant entities as low, moderate or high risk in terms of their likely involvement in and/or connection to modern slavery. The Relevant Companies are committed to sending out the Modern Slavery Statement and Policy to all Relevant Company vendors that make up the top 75% of spend, as well as the relevant third parties that have been identified.

Any vendors or relevant third parties that receive a rating of medium or higher in the fifth annual Modern Slavery Risk review will also receive a mid-year review aimed at identifying if any further information about the vendor or relevant third party concerning modern slavery has been made available since the previous review. The category of relevant third parties has also been expanded.

Vendor Due Diligence Processes

As part of ICE's initiative to identify and mitigate relevant risks, the ICE Vendor Management Policy framework comprises two main elements: (i) Due Diligence and (ii) Risk Assessment. These procedures include but are not limited to:

1. Due Diligence and Initial Risk Assessment

All vendors must complete a vendor profile. The Vendor Management Office ("VMO") performs an initial qualification of the vendor to generate the relevant risk assessments (including but not limited to factors such as Info-sec, HR, Financial, BCP, physical security and compliance with applicable law which includes modern slavery legislation). The depth of the assessments is driven by the criticality, scope of engagement as well as the initial risk qualification. Reviews entail inquiry into legal, regulatory and reputational public and non-public records. Each vendor is evaluated using the vendor rating scorecard as defined within the Vendor Management System ("VMS").

ICE continues to review the vendor risk assessment process with the aim of ensuring that it can identify vendors that may be affected by modern slavery practices.

2. Risk Assessment

Each vendor will be evaluated and VMO is responsible for evaluating vendors based on a defined criteria and assigning vendors to an appropriate risk class. Risk ratings are reviewed when a material change in the vendor relationship is identified or if the vendor's ability to provide services to ICE is impacted by an external or internal event. The VMO updates the data in the VMS and a recalculation of the tier is automatically generated. If a recalculation results in the change of a risk tier, a communication is sent to the business owner and respective risk partners notifying them of the change in frequency with which VMO assesses the vendor relationship.

The VMO and business units will periodically consider and review vendors in the highest risk category no less than annually. This takes into account various considerations, including but not limited to changes with the vendor, industry-wide changes (regulatory, legal, or other industry wide change) or changes within ICE VMO (for example information security, BCP, KPI changes).

[1] "The Global Slavery Index 2018" available here: https://www.globalslaveryindex.org/resources/downloads/#gsi-2018 the Freedom in the World, available here: https://freedomhouse.org/countries/freedom-world/scores the US Department of State's Trafficking in Person's Report 2020, available here: https://www.state.gov/reports/2020-trafficking-in-persons-report/ and the US Department of Labour List of Goods and Services, available here: https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods.

Complaint Reporting Procedures

Complaints or concerns related to ICE accounting, auditing, internal controls or financial reporting can be submitted anonymously and confidentially, or with full disclosure. Our employees around the world have access to a hotline that can be easily found on the company's internal website and is part of ICE's Global Reporting and Anti-Fraud Policy. For external parties wishing to access the hotline, they can refer to the Global Code of Business Conduct policy.

Vendor adherence to our values

ICE has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and vendors comply with our values, we ensure when entering into a contract with a vendor, our standard terms and conditions require vendors to adhere to all applicable laws, which will include relevant anti-slavery legislation.